

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

UNITED STATES OF AMERICA	§	
	§	
	§	Case No. 4:18-CR-00368
v.	§	
	§	
	§	
RONNIE MCADA, JR.	§	

**DEFENDANT RONNIE MCADA, JR.'S MOTION
FOR APPOINTMENT OF COUNSEL**

TO THE HONORABLE ALFRED H. BENNETT:

Defendant Ronnie McAda, Jr. (“Mr. McAda”) respectfully requests that the Court appoint counsel for his continued defense in this case pursuant to 18 U.S.C. §§ 3006A(a) and (b). His grounds for this request are the following:

The Court called this complex criminal health care fraud case for jury trial beginning November 7, 2022. ECF No. 305. After approximately five weeks of trial, the Court was forced to declare a mistrial on December 13, 2022, based on government misconduct. *See* Minute Entry dated December 13, 2022. The case remains pending before the Court, and is likely to be reset for trial sometime this spring.

Mr. McAda retained defense counsel after learning of the government’s investigation that led to his indictment and ultimately his mistrial. Retained counsel defended him for years before his indictment, after indictment, in preparation for and throughout the month-and-a-half long trial, and in all proceedings after the mistrial caused by a series of government discovery violations.

Mr. McAda’s financial resources have been drained by the years spent defending himself, both before and after indictment. This is the case despite the fact that Mr. McAda has worked his entire adult life, holds a degree from the West Point Military Academy, served his country

honorably as an officer in the United States Army, always and timely paid his taxes, and has always financially supported his family and others in need.

In the course of defending himself against these charges, Mr. McAda and his family have depleted all of their retirement and other savings. They have borrowed from—and repaid—family and friends, sold their home and moved in with Mr. McAda’s in-laws, and drive one family car after selling their other vehicle. The McAdas are left with very little money to live on, much less defend a second jury trial caused solely by the government-induced mistrial.

As the Court knows, this is a complex, multiple count and multiple defendant federal fraud case involving allegations of millions of dollars in billings to federal health care programs. Consequently, the stakes for Mr. McAda are enormous. Similarly, he would be severely disadvantaged and prejudiced by changing defense counsel at this stage of the case, jeopardizing his right to effective representation and to a defense. Existing counsel, for the same reason, is compelled to continue to defend Mr. McAda and stand by his side. Through this motion, counsel seeks the Court’s assistance in doing just that.

Mr. McAda and his family have been financially ruined by this case. The mistrial and continued prosecution have left him without the ability to defend himself. This is demonstrated by the attached Financial Affidavit in Support of Request for Attorney, Form CJA-23. *See* Exhibit 1. Because Mr. McAda is financially unable to bear the cost of his continued defense, and as described by counsel at the December 20, 2023 status hearing, he respectfully requests that the Court grant this motion for the appointment of counsel under 18 U.S.C. §§ 3006A.

WHEREFORE, Defendant Ronnie McAda, Jr. respectfully requests that this Motion for Appointment of Counsel be granted.

Dated: January 9, 2024

Respectfully submitted,

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**ATTORNEYS FOR DEFENDANT
RONNIE MCADA, JR.**

CERTIFICATE OF CONFERENCE

I certify that on January 8, 2024, counsel for Mr. McAda conferred with Nick Peone, lead counsel for the government, regarding this motion. Mr. Peone advised that the government does not oppose the relief requested in this motion.

Jeff Ansley

Jeffrey J. Ansley

CERTIFICATE OF SERVICE

I certify that on January 9, 2024, I electronically transmitted the foregoing document to the Clerk for the U.S. District Court, Southern District of Texas, using the ECF system of the Court.

Jeff Ansley

Jeffrey J. Ansley